

REMARKS

Reconsideration and allowance of the above referenced application is respectfully requested.

Claims 1-2, 5-6, 9-10, 13, 15-17, 19-21, 23-28, 31, 33, 35, 37, 39, 41, and 43 stand rejected under 35 U.S.C. §103 as allegedly being unpatentable over Parnafes et al. in view of Kuznetsov. Claims 32, 34, 36, 38, 40, 42, and 44 stand rejected under 35 U.S.C. §103 as allegedly being unpatentable over Parnafes et al. in view of Kuznetsov, and further in view of Davis. These contentions are respectfully traversed.

Claims 1, 5, 9, 13 and 17 have been amended to specify that the file containing a network policy and a translation specification is the same file that is received by plural clients in a network. Claims 21 and 25 are amended to specify that the file is sent to all clients in the network. This should further emphasize the patentable subject matter of these claims. Applicants respectfully request that these claims be allowed.

The office action admits Parnafes does not explicitly indicate that both the network policy and the translation specification are received at the client in a file. However, the Office Action contends that Kuznetsov teaches this step because it teaches a way of using mobile files transmitted to a

client to perform a translation. With all due respect, this contention is respectfully traversed.

Parnefes in view of Kuznetsov does not teach sending a single file to plural computers (claims 1-17) or all computers (claims 21-25) over a network that contains all of the data needed to translate a policy and configure a network system based on that policy. Kuznetsov may teach how to translate a policy from a first schema to a second schema and that this translation can be done on a client. However, Kuznetsov does not teach sending out a single file that contains all the data needed for multiple or all of the clients on a network. The mere fact that files may be mobile does nothing to suggest this claimed subject matter. In fact, having too many mobile files would actually add to the network congestion that the claimed techniques may seek to avoid.

A hypothetical combination of Parnafes in view of Kuznetsov would disclose a method where a non-COPS client: 1) sends its schema to a proxy server; 2) the proxy server sends this schema to a policy server; 3) the policy server sends the proxy server the policy, the schema of the policy, and a translation specification between the schema of the transmitted network policy and the schema of the client's network policy; 4) the proxy server sends the policy, the schema of the policy, and a translation specification between the schema of the transmitted network policy and the schema of the client's network policy;

and 5) the client then translates the policy using the translation specification. Kuznetsov is used in this hypothetical combination to teach that it is possible for the schema of the policy and the translation specification to be mobile.

The hypothetical combination does not teach a method where a policy server can broadcasts a single file containing a network policy and a translation specification, the file being the same file received by many or all clients in a network. Instead, the hypothetical combination teaches that the policy server must send each and every client a customized file specifically created for the client. Since Kuznetsov teaches that a translator compiler engine takes in as inputs a first schema, a second schema, and a data map or translation specification to translate between the two schema, each customized file will contain a network policy, the schema associated with that network policy, and a data map or translation specification. See Column 10, lines 55-65. Forcing the policy server to customize a file for each client creates a queue where the policy server individually creates a translation specification for each client and then sends each customized file to each client. This makes updating network policies across a network a much slower process, particularly in large networks where there are thousands of clients.

Unlike the hypothetical combination, the claims define a file being sent, that needs to contain a network policy and a translation specification. The claimed method may reduce congestion, for example, and avoid the otherwise need to form a queue. The claimed system uses a single file is used for all or many clients instead of needing to customize a file for each client. The policy server can simply transmit the same file over the entire network instead of to each client, one at a time. Applicant's method also saves the policy server processing time because the policy server only has to create a single file. Network policy updates can therefore be done in a quicker and more efficient manner without the backlog that may result from a queue.

Last, the hypothetical combination teaches a method where the policy server rigidly assumes that all of the clients do not have translators. Parnafes uses a mapping database located on the policy server, so all translations must be done on the policy server. Kuznetsov teaches that the policy server and client must communicate as to where the translation is to take place. Assuming that the client does not have translator results in the policy server performing more of the translating work than is needed.

All of the claims should hence be allowable.

Claims 2, 6, 10, 15, 16, 19, 20, 23, 24, 26, and 27 should be allowable for reasons discussed above with respect to claims 1, 5, 9, 13, 17, 21, and 25. as well as on their own merits.

Regarding claims 31, 33, 35, 37, 39, 31, and 43, the Office Action argues that Parnafes teaches that the specification for translating includes information for translating the network policy from one version number to another version number. With due respect, this contention is traversed. Parnafes does not explicitly disclose translating policies based on a version number. Translating a network policy from one version number to another version number makes it easy for a network policy to keep track of how many different translation specifications are needed to translate the entire network without receiving information from the different clients as to the network policies currently employed. In addition, these claims should be allowable for reasons discussed above with respect to claims 1, 5, 9, 13, 17, 21, and 25.

Regarding claims 32, 34, 36, 38, 40, 42, and 44, the Office Action argues that Davis teaches a system for translating policies using XML and style sheets. With due respect, this contention is traversed. Davis teaches that an unencrypted input document and an encrypted output document can both be in XML format, with the input and output documents being policies. See Column 6, lines 55-61. However, Davis does not teach the

step of translating a network policy by changing an encryption algorithm. Davis merely teaches that different encryption algorithms can be used on different key classes and therefore for different policies. See Column 23, lines 59-65. For example, one policy may be encrypted using 3DES, and another policy may be encrypted using BLOWFISH. But Davis does not teach translating a network policy so that 3DES is used instead of BLOWFISH. The claims define one facet of updating a network policy is changing the encryption algorithm that is used. These claims should also be allowable for reasons discussed above with respect to claims 1, 5, 9, 13, 17, 21, and 25.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue, or comment, does not signify agreement with or concession of that rejection, issue, or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicants ask that all claims be allowed. No fee is believed to be due, however please apply any credits or additional charges to deposit account 06-1050.

Respectfully submitted,

Date: June 25, 2007

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